

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

UNITED STATES OF AMERICA	)	CASE NO. 24 CR 00176
	)	
PLAINTIFF	)	JUDGE PAMELA BARKER
	)	
v.	)	
	)	<b><u>SUPPLEMENT TO</u></b>
GEORGE BAYNES	)	<b><u>MOTION TO APPROVE/</u></b>
	)	<b><u>APPOINT INVESTIGATOR</u></b>
DEFENDANT	)	

Defendant George Baynes now submits the following supplemental information in regard to his request for an investigator: Investigator Christopher Giannini of International Investigations, 4758 Ridge Road, #207 Cleveland, Ohio 44144, will charge his time at the rate of \$75. to \$90. per hour depending on the work performed. Investigator Giannini's total amount of fees for his work in this matter will not exceed \$2,500.00. Giannini and his firm will not exceed 30 hours of work in connection with this case. Defendant, therefore, requests authorization and approval of investigator fees up to \$2,500.00.

For the foregoing reasons, Defendant requests that Mr. Giannini and his firm International Investigations be assigned as his investigator in this matter.

Respectfully submitted,

/s/ Michael P. Maloney

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**CERTIFICATE OF SERVICE**

A copy of the foregoing Motion was served this 3<sup>rd</sup> day of July, 2025 to the United States Attorney, through the court's electronic filing system.

*/s/ Michael P. Maloney*

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Michael P. Maloney (0038661)  
Attorney for Defendant